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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	Case No. 2:16 CR 631 DAK
Plaintiff,	
vs.	SUPPLEMENTAL NOTIFICATION OF COMPLIANCE AND REQUEST FOR RECIPROCAL DISCOVERY
AARON MICHAEL SHAMO, DREW WILSON CRANDALL, ALEXANDRYA TONGE, KATHERINE BUSTIN, MARIO NOBLE, and SEAN GYGI,	Judge Kimball
Defendants.	

The United States of America, by and through the undersigned, hereby files its supplemental notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendants.

The United States gives notice that the following is being or has been provided to counsel for the defendants:

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Description	Bates Number
<p>Discovery produced: NOC 04</p> <p>Contains some Native files (019) Contains some Native files (020)</p>	<p>001-001-001-00167 – 001-001-001-00171 001-011-001-00001 – 001-011-001-00002 001-012-001-00001 – 001-012-001-00061 001-015-001-00001 – 001-015-006-00001 001-016-001-00001 – 001-016-004-00013 001-017-001-00001 001-018-001-00001 – 001-018-001-00003 001-018-002-00001 (audio file) 001-018-003-00001 – 001-018-003-00002</p> <p>002-001-001-00448 – 002-001-001-00459 002-009-001-00039 – 002-009-001-00079 002-016-001-00810 – 002-016-001-00816 002-019-001-00001 – 002-019-014-00001 002-020-001-00001 – 002-020-012-00001 002-021-001-00001 – 002-021-015-00126 002-022-001-00001 002-023-001-00001 – 002-023-003-00001 002-024-001-00001 – 002-024-002-00001 002-025-001-00001 (audio file) 002-025-002-00001 – 002-025-007-00003 002-028-001-00001 (native) 002-029-001-00001 002-030-001-00001 002-031-001-00101 – 002-031-001-00002 002-032-001-00001 – 002-032-001-00003 002-033-001-00001 – 002-033-001-00005 002-034-001-00001 – 002-034-001-00002 002-035-001-00101 – 002-035-001-00002 002-036-001-00001 – 002-036-001-00002 002-037-001-00001 (video file) 002-038-001-00001 (audio file) 002-038-002-00001 - 002-038-002-00006 002-039-001-00001 – 002-039-001-00002</p> <p>003-013-001-00001</p> <p>004-005-004-00001 – 004-005-007-00002 004-007-008-00031 – 004-007-008-00042 004-007-010-00005 – 004-007-010-00008 004-007-011-00003 – 004-007-011-00005 004-007-012-00193 – 004-007-012-00198 004-007-026-00009 – 004-007-026-00011 004-007-028-00011 – 004-007-028-00020 004-007-031-00001 – 004-007-031-00011</p>

Additional discs:	(N-91)	001-013-001-00001
	(N-92)	001-014-001-00001

The United States continues to make available forensic data from seized electronic devices. The latest devices are listed as follows. Parties who seek to obtain their own copy of the forensic data have been asked to provide an 8TB hard drive and a 3TB hard drive to the United States Attorney's Office.

BATES NUMBERS				DESCRIPTION
002	026	001	00001	Shamo iPhone 6s
002	027	001	00001	Shamo iPhone 7 – Axiom, Cellebright

As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and
- c. A written summary of the testimony of any expert the defendant intends to use a trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 31st day of January, 2018.

JOHN W.HUBER
United States Attorney

/s/ Michael Gadd
MICHAEL GADD
Special Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the United States Attorney's Office, and that a copy of the foregoing SUPPLEMENTAL NOTIFICATION OF COMPLIANCE was made available to all parties named below, this 31st day of January, 2018.

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/s/ Yvette Laughter
Litigation Support Specialist